

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION

FILED  
RICHARD W. NAGEL  
CLERK OF COURT

2024 JUL 18 AM 11:56

UNITED STATES OF AMERICA,

Plaintiff,

vs.

SA'D WATKINS,

Defendant.

CASE NO. 2:24-cr-00110

JUDGE NAGEL

INDICTMENT

21 U.S.C. § 841(a)(1)

21 U.S.C. § 841(b)(1)(A)

21 U.S.C. § 841(b)(1)(B)

21 U.S.C. § 846

FORFEITURE ALLEGATION

**THE GRAND JURY CHARGES:**

**COUNT ONE**

(Conspiracy to Distribute and Possess with Intent to Distribute Fentanyl)

Beginning in or around September 2022, and continuing to in or around July 2024, in the Southern District of Ohio, the defendant, **SA'D WATKINS**, did knowingly, intentionally and unlawfully combine, conspire, confederate and agree with other individuals, both known and unknown to the Grand Jury, to distribute and possess with intent to distribute 400 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly referred to as fentanyl, a Schedule II controlled substance.

**In violation of 21 U.S.C. §§ 846, 841(a)(1), and 841(b)(1)(A)(vi).**

**COUNT TWO**

(Distribution of Fentanyl)

On or about May 31, 2024, in the Southern District of Ohio, the defendant, **SA'D WATKINS**, did knowingly, intentionally and unlawfully distribute 40 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly referred to as fentanyl, a Schedule II controlled substance.

**In violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(vi).**

**FORFEITURE ALLEGATION**

The allegations contained in this Indictment are hereby re-alleged and incorporated here by reference for the purpose of alleging forfeitures to the United States of America pursuant to 21 U.S.C. § 853(a)(1) and (2).

Upon conviction of the offenses set forth in Counts One and/or Two of this Indictment, the defendant, **SA'D WATKINS**, shall forfeit to the United States, in accordance with 21 U.S.C. § 853(a)(1) and (2), any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violation, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violations.


**Forfeiture pursuant to 21 U.S.C. § 853(a)(1) and (a)(2) and Rule 32.2 of the Federal Rules of Criminal Procedure.**

**A TRUE BILL.**

  
**FOREPERSON**

**KENNETH L. PARKER**  
United States Attorney

  
**NICOLE PAKIZ (0096242)**  
Assistant United States Attorney

  
**JENNIFER M. RAUSCH (0075138)**  
Assistant United States Attorney